



August 24, 2012

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 12-EPIC-01
1516 Ninth Street Sacramento, CA 95814-5512

California Energy Commission

DOCKETED

12-EPIC-1

TN # 66954

AUG 27 2012

**Re: Electric Program Investment Charge: Comments on the
California Energy Commission's First Triennial Investment Plan**

Audubon California is the state office of National Audubon Society with 150,000 members and supporters in California. Audubon's mission is to conserve and restore natural ecosystems, focusing on birds, other wildlife, and their habitats for the benefit of humanity and the earth's biological diversity. For more than a century, Audubon has built a legacy of conservation success by mobilizing the strength of its network of members, Chapters, Audubon Centers, state offices and dedicated professional staff to connect people with nature and the power to protect it.

In recognition of the growing threats to human and ecological communities presented by the release of greenhouse gases and the resultant climate change, we have championed the aggressive development of both energy conservation and renewable energy generation to reduce those threats. In locations throughout our state Audubon at the state level, and our chapters at a local level, have successfully collaborated on the development of renewable energy facilities— striking a balance between landscape conservation priorities and renewable energy.

Audubon California appreciates the opportunity to provide comments on the Energy Commission's First Triennial Electric Program Investment Charge ("EPIC") Investment Plan ("Plan").

The portion of the EPIC Program administered by the Energy Commission will provide funding for applied research and development, technology demonstration and deployment, and market facilitation for clean energy technologies and approaches for the benefit of the ratepayers of the state's major investor-owned utilities.

We focus on the three major questions that evolved during the workshop held on August 2, 2012:

- What are the major barriers to developing and commercializing clean energy technologies?
- What specific initiatives are recommended to advance innovative energy technologies that benefit ratepayers?
- Prioritize initiatives and identify the benefits that should be anticipated.

We suggest that a major barrier to developing and commercializing all clean energy technologies, and that creates the most barriers for the development of wind energy in California, are the data gaps we defined in our joint comment letter on the Desert Renewable Energy Conservation Plan (DRECP) entitled "Environmental NGO Wind Energy Recommendations (8-24-12)" to Dave Harlow, Director, DRECP, c/o California Energy Commission.

Those critical data gaps are:

- Migratory bird and bat pathways
- Locations of bat hibernacula and daily bat movement patterns
- Regional population viability of the Golden eagle
- California condor location, movement, wind usage, and current habitat use patterns
- Avian mortality on existing wind farms

We suggest that directing funding from the Electric Program Investment Charge to research on the above critical data gaps would benefit ratepayers by not only the eventual removal of potential biological impacts as barriers to the development of clean energy, but also by protecting and conserving public trust resources of wildlife and habitat.

The resultant savings to ratepayers, and developers in reduced costs of species and habitat recovery programs by public agencies, and restoration, mitigation and management programs, and in potential curtailed operations are greater than the costs of the research, and would provide for greater support by the public for large-scale renewable energy development.

Audubon California urges the California Energy Commission to consider funding these critical research needs for clean energy in California through the Electric Program Investment Charge.

Sincerely,

A handwritten signature in black ink, appearing to read "Garry George", followed by a horizontal line extending to the right.

Garry George
Renewable Energy Project Director
[AUDUBON CALIFORNIA](#)
4700 North Griffin Ave.
Los Angeles, CA 90031
323-933-6660 p
ggeorge@audubon.org